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January 15, 2025

VIA ELECTRONIC FILING AND EMAIL

The Honorable Mitchell S. Goldberg, Chief Judge
United States District Court
Eastern District of Pennsylvania
Room 17614
601 Market Street
Philadelphia, Pennsylvania 19106-1797
By Email to: Goldberg_chambers@paed.uscourts.gov

RE: *Calderaio v. Central Bucks School District*
E.D.Pa. Civil Action 2:23-cv-04218-MG

Dear Chief Judge Goldberg:

I write on a discovery matter, pursuant to Section 4 of Your Honor's Policies and Procedures.

The subject of the requested production¹ is records relating to former Central Bucks School District (CBSD) music teacher Bridgett Szychulski, who in 2015 was sentenced for offenses involving sexual contact with a minor CBSD student, occurring in 2012, some of which contacts were on CBSD school grounds. Based upon the affidavit of probable cause (attached as Exhibit A) and reports in the news media,² CBSD would have been aware of the allegations no later than September 12, 2014, when she was suspended by CBSD. At the time of her arrest, Szychulski had been transferred from the middle school where the conduct occurred to a CBSD high school.

Plaintiff in this matter, John Calderaio, alleges that he was the victim of sexual abuse by CBSD high school choir director, Joseph Ohrt, in the winter of 2014 and 2015 through to the end of the 2015 school year (mid-June), and during his 2015-2016 senior school year. Plaintiff alleges that CBSD was on notice of sexual abuse of its students by faculty members, including Ohrt, as far back as the early 1990's but failed to take appropriate steps to protect students from predation, instead transferring him from an elementary school where alleged sexual misconduct with a student occurred to a CBSD high school. Ohrt pleaded no contest and was sentenced in 2023 to various sexual offenses including crimes he committed against the Plaintiff. Two of Ohrt's 1990's victims offered impact statements during Ohrt's 2023 sentencing.

¹ The specific requests and responses have been extracted and appear on Exhibit B, attached hereto.

² See, e.g. <https://www.cbsnews.com/philadelphia/news/bucks-music-teacher-charged-with-having-sex-with-male-student-14/> (last viewed January 13, 2025).

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The parties have met and conferred on the matter that is the subject of this letter, at which time counsel for Defendant CBSD continued to maintain objections on two grounds: 1) that the requested production is not calculated to lead to the discovery of relevant evidence; and 2) a court order is necessary because the requested production contains confidential information on the identity of student witnesses.

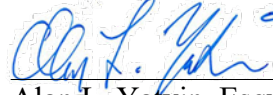
Plaintiff's position is that the requested information is relevant to notice to CBSD, going back to the 1990's and the case of Szychulski, predating the conduct alleged in this case, that its policies and procedures, were inadequate to protect its students from sexual predation by its staff, generally, in the environs of its schools' music facilities, where there was inadequate monitoring of activities in those spaces or protective policies in place, and in its educating students and staff regarding identifying, reporting and addressing inappropriate staff-student conduct.

As to Defendant's objection based upon confidentiality of information regarding student witnesses, there is a confidentiality order in effect in this case (ECF Doc. 15). Further, none of the students who were in middle school or high school between 2012 and 2014, would be minors at this time.

Thank you for your consideration.

Respectfully,

WEIR LLP



Alan L. Yatvin, Esquire

Attorneys for Plaintiff

cc: All Counsel of Record (via ECF)